

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROBERT GONZALEZ, on behalf of himself
And all other similarly situated

Plaintiff,

Case No.: 12-cv-783 (ER)

v.

RELIN GOLDSTEIN & CRANE, LLP

Defendant.
-----X

NOTICE OF PLAINTIFF'S MOTION FOR ATTORNEY'S FEES AND COSTS

Plaintiff hereby moves this Court for an award of attorney's fees and costs in this case and states as follows:

1- This is a class action brought under the Fair Debt Collection Practices Act ("FDCPA") 15 U.S.C. § 1692 *et seq.*. The FDCPA authorizes statutory damages for an individual plaintiff of up to \$1,000 and for the class, the lesser of \$500,000 or 1% of the Defendant's net worth.

2- The Amended Complaint in this action sought relief in the form of statutory damages for the plaintiff and the class.

3- A resolution was reached in this case whereby the plaintiff received \$1,000 and the class received greater than 1% of the Defendant's net worth.

4- As prevailing party, Plaintiff is entitled to an award of reasonable attorney's fees under the FDCPA 15 U.S.C. § 1692k. Defendant has agreed to pay \$15,000 in attorney's fees and costs subject to the approval of the Court.

5- The tasks undertaken by Plaintiff's counsel to reach the successful resolution of this case are set forth in the Declaration submitted herewith.

6- The reasonable costs expended in this litigation are also set forth in the Declaration.

WHEREFORE, Plaintiff respectfully requests that the Court grant plaintiff an award of \$15,000 for attorney's fees and costs.

Dated: 10/15/12 New York, NY

Respectfully Submitted,



Shimshon Wexler

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